

To: Smith, Claudia[Smith.Claudia@epa.gov]
Cc: Toney, Mike[Toney.Mike@epa.gov]; Rothery, Deirdre[Rothery.Deirdre@epa.gov]
From: Stoneman, Chris
Sent: Tue 11/10/2015 4:04:00 PM
Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Mike -- I got your voicemail. I would address your memo to Deirdre Rothery. She is the R8 supervisor responsible for the rulemaking. Claudia can provide her info. Chris

-----Original Message-----

From: Johnson, Steffan
Sent: Tuesday, November 10, 2015 10:43 AM
To: Stoneman, Chris <Stoneman.Chris@epa.gov>; Smith, Claudia <Smith.Claudia@epa.gov>
Cc: Toney, Mike <Toney.Mike@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>
Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Chris,

Thank you, that's very helpful.

Stef

-----Original Message-----

From: Stoneman, Chris
Sent: Tuesday, November 10, 2015 10:32 AM
To: Johnson, Steffan <johnson.steffan@epa.gov>; Smith, Claudia <Smith.Claudia@epa.gov>
Cc: Toney, Mike <Toney.Mike@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>
Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Hi Stef --

Here you go:

Approval and Promulgation of Federal Implementation Plan for Existing Oil and Natural Gas Well Production Facilities; Uintah and Ouray Indian Reservation in Utah

Thanks for taking care of this.

Chris

-----Original Message-----

From: Johnson, Steffan
Sent: Tuesday, November 10, 2015 9:22 AM
To: Smith, Claudia <Smith.Claudia@epa.gov>; Stoneman, Chris <Stoneman.Chris@epa.gov>
Cc: Toney, Mike <Toney.Mike@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>
Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Claudia,

Would you please tell us the formal title of your rule?

We will need to refer to the rulemaking by its formal name in our response.

Thank you!

Stef

-----Original Message-----

From: Smith, Claudia

Sent: Monday, November 09, 2015 4:00 PM

To: Johnson, Steffan <johnson.steffan@epa.gov>; Stoneman, Chris <Stoneman.Chris@epa.gov>

Cc: Segall, Robin <Segall.Robin@epa.gov>; Toney, Mike <Toney.Mike@epa.gov>

Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Stef,

We are writing a Reservation-specific FIP, which is a rule, but is not a "permit-by-rule" type of rule like 40 CFR 49.162. Our rule requires test methods Methods 21 (LDAR) and 22 (combustors). I think Chris was just providing the letter in question of an example of how you assisted us in the past for Tribal rulemakings.

Contact me or Chris if you have any further questions.

Thanks,

Claudia

-----Original Message-----

From: Johnson, Steffan

Sent: Monday, November 09, 2015 1:38 PM

To: Stoneman, Chris; Smith, Claudia

Cc: Segall, Robin; Toney, Mike

Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Chris,

Sure. The attached letter you sent referenced the same rules that I did, part 49, subparts 156(c) and 162.

I was wondering if your current NTTA enquiry was in support of those same subparts? It appears that you are writing a FIP, not a rule.

Is that correct?

Stef

-----Original Message-----

From: Stoneman, Chris

Sent: Monday, November 09, 2015 2:46 PM

To: Smith, Claudia <Smith.Claudia@epa.gov>; Johnson, Steffan <johnson.steffan@epa.gov>

Cc: Segall, Robin <Segall.Robin@epa.gov>; Toney, Mike <Toney.Mike@epa.gov>

Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Stef -- We're confused -- can you clarify -- Thanks. Chris

-----Original Message-----

From: Smith, Claudia

Sent: Monday, November 09, 2015 11:38 AM

To: Johnson, Steffan <johnson.steffan@epa.gov>; Stoneman, Chris <Stoneman.Chris@epa.gov>

Cc: Segall, Robin <Segall.Robin@epa.gov>; Toney, Mike <Toney.Mike@epa.gov>

Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Chris,

I'm not sure I understand what Steffan is asking. 40 CFR 49.156(c) talks about the categories for which general permits will be issued and 49.162 talks about the autobody and surface coating general permit.

The R8 Oil and Gas rule would be a Reservation-specific FIP for existing oil and gas sources (not a GP or PBR) proposed under Part 49, subpart K, CFR sections 49.4169-49.4183.

Thanks,

Claudia

-----Original Message-----

From: Johnson, Steffan

Sent: Monday, November 09, 2015 9:21 AM

To: Stoneman, Chris

Cc: Smith, Claudia; Segall, Robin; Toney, Mike

Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Chris,

Is R8's Oil and Gas rule referencing the same subparts [156(c) and 162]?

If so, great. If not, would you please provide the referencing subpart for the rule?

Thanks,

Stef

Stef Johnson | Leader | Measurement Technology Group | Office of Air Quality Planning & Standards |
U.S. Environmental Protection Agency | 109 T.W. Alexander Drive | E-143-02 | Research Triangle Park,
NC 27711 | Desk: 919.541.4790 | Cell: 919.698.5096 | Fax: 919.541.0516

-----Original Message-----

From: Stoneman, Chris

Sent: Wednesday, November 04, 2015 9:00 AM

To: Johnson, Steffan <johnson.steffan@epa.gov>

Cc: Smith, Claudia <Smith.Claudia@epa.gov>

Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Hi Steffan --

I need to ask a favor. OAQPS is supporting R8 as it develops a rule to reduce emissions from oil and gas activity on the Uintah and Ouray Reservation in Utah. The rule references two test methods that we need to check on VCs for. Previously, MTG has helped us out on this for related actions we have taken in Indian country (see attached). Would you guys be willing to do another memo for R8's action?

R8's action is part of the Agency's overall oil and gas strategy and is being undertaken in close coordination with OAR.

Thanks.

Chris

-----Original Message-----

From: Smith, Claudia

Sent: Tuesday, November 03, 2015 4:16 PM

To: Stoneman, Chris <Stoneman.Chris@epa.gov>

Subject: RE: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Chris,

The following test methods are found in the requirements of the draft U&O FIP:

- Combustors - EPA approved performance test methods found in 40 CFR Part 60, Subpart OOOO/OOOOa, as demonstrated by the operator or the manufacturer; Method 22
- LDAR - An optical gas imaging instrument, as defined in 40 CFR 60.18(g)(4), EPA Method 21

Thanks,

Claudia

-----Original Message-----

From: Stoneman, Chris

Sent: Tuesday, November 03, 2015 12:58 PM

To: Smith, Claudia

Subject: Emailing: vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Your message is ready to be sent with the following file or link attachments:

vcs for general permits and permits by rule for the indian country minor new source review program; 40 cfr part 49, subparts 156(c) and 162.pdf

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.